

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MATTA,

Petitioner,

- against -

UNITED STATES OF AMERICA, *et al.*,

Respondent.

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TO BE FILED UNDER SEAL

**SUPPLEMENTAL DECLARATION IN
SUPPORT OF GOVERNMENT’S
RESPONSE TO PETITIONER’S
APPLICATION FOR RETURN OF
PROPERTY**

Case No. 23-misc-2909
(Merchant, J.)

DECLARATION OF SPECIAL AGENT [REDACTED]

[REDACTED], Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”) of the United States of America, hereby declares under penalty of perjury:

1. I am submitting this supplemental declaration in support of the Government’s Response to Petitioner’s Application for Return of Property.

2. [REDACTED]

[REDACTED]

3. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

4. Based on my investigation and conversations with [REDACTED], Matta is the owner of an investment firm called Optimum Asset Management (“OAM”), a real estate investor and developer with offices in Europe, as well as Miami and New York. Matta secured the IOR as an institutional investor and has reportedly managed over 200 million Euros in assets belonging to the IOR.

5. [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED].

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

7. [REDACTED]

[REDACTED] that Matta and his firm formed U.S. entities and applied for investment visas to travel to the U.S. and manage investments in U.S. real estate, in excess of 200 million Euros. OAM has opened several companies with the State of Florida Division of Corporations, including Optimum Asset Management USA, LLC in 2018 and Optimum USA Investment 6, LLC in 2020. OAM has acquired real estate in South Florida within the last five years, including the Monaco Yacht Club & Residences in Miami Beach, Florida built in 2022. Matta has traveled to the U.S. regularly since 2014.

8. On October 7, 2023, upon arrival in the United States, Matta informed U.S. Customs and Border Protection officers that the purpose of his travel was to meet with clients and investors. Matta furnished a Samsung Galaxy S23 cellular phone and a Microsoft Surface Book laptop. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury, pursuant to 28. U.S.C. 1746, that the foregoing is true and correct to the best of my knowledge.

Date: [REDACTED]
March 8, 2024

[REDACTED]
Special Agent
Homeland Security Investigations